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15 ROLANDO PIMENTEL AND
ZACHARIAS SALAS

16 UNITED STATES DISTRICT COURT
17 NORTHERN DISTRICT OF CALIFORNIA

18 ROLANDO PIMENTEL, et al.,

19 Plaintiffs,

20 v.

21 ROBERT BONSALL, et al.,

22 Defendants.

CASE NO. 3:18-cv-01958-EMC

Related to Case No. 18-cv-00411-EMC

**STIPULATION AND [PROPOSED]
ORDER RE AMENDMENT OF
COMPLAINT AND DISCOVERY** (MODIFIED)

Date: August 30, 2018
Time: 1:30 p.m.
Courtroom: 5, 17th Floor
Judge: Hon. Edward M. Chen

Complaint Filed: February 2, 2018
Trial Date: Not set

1 Plaintiffs Rolando Pimentel and Zacharias Salas (“Plaintiffs”) and Defendants Robert
2 Bonsall and Beeson, Tayer, & Bodine APC (“Defendants”) (collectively, “the Parties”) having met
3 and conferred subsequent to the Case Management Conference held on May 31, 2018, hereby
4 submit the following stipulation. The parties agree:

5 1. Plaintiffs will not be amending the Complaint as against Defendants Robert Bonsall
6 and Beeson, Tayer, & Bodine APC at this time, but reserve the right to do so after the pending
7 motion to dismiss is resolved.

8 2. Pursuant to this Court’s Civil Minutes of the May 31, 2018 Case Management
9 Conference, counsel for the parties met and conferred on June 8, 2018 regarding the scope of
10 discovery to be conducted between now and August 30, 2018, and have no disputes to report.

11 Dated: June 11, 2018

GORDON REES SCULLY MANSUKHANI, LLP

12 By: /s/ Ryan B. Polk
13 Linda M. Moroney
14 Ryan B. Polk
15 Kevin Liu

16 Attorneys for Defendants
17 ROBERT BONSALL AND
18 BEESON, TAYER, & BODINE APC

19 Dated: June 11, 2018

20 Law Office of Kenneth C. Absalom

21 By: /s/ Kenneth C. Absalom
22 Kenneth C. Absalom
23 *Counsel for Plaintiff's Pimentel and Salas*

24 **ATTESTATION**

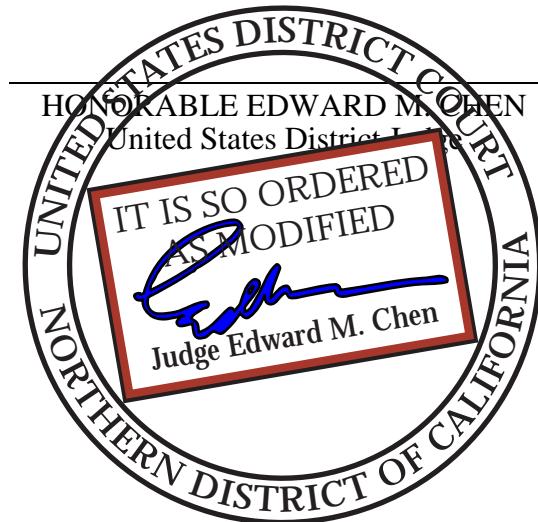
25 In accordance with Civ. L.R. 5.1(i)(3), I attest that concurrence in the filing of this
26 document has been obtained from the other Signatories, which shall serve in lieu of their signatures
27 on the document.

Dated: June 11, 2018

By: /s/ Kevin Liu
Kevin Liu

1 **IT IS SO ORDERED.** Motion to dismiss and CMC reset from 8/30/18 to 9/6/18
2 at 1:30 p.m. Joint CMC statement due 8/30/18.
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4 DATED: 6/12, 2018
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CERTIFICATE OF SERVICE

I am a resident of the State of California, over the age of eighteen years, and not a party to the within action. My business address is: Gordon Rees Scully Mansukhani, LLP, 275 Battery Street, Suite 2000, San Francisco, CA 94111. On the date below, I served the within documents:

**STIPULATION AND [PROPOSED] ORDER RE AMENDMENT OF COMPLAINT AND
DISCOVERY**

- BY ELECTRONIC MAIL:** I hereby certify that on _____ 2018, a copy of the foregoing documents were filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. All other parties will be served by regular U.S. Mail. Parties may access this filing through the Court's electronic filing system.
 - BY OVERNIGHT MAIL.** I deposited said document(s) by placing a true copy thereof enclosed in a sealed envelope, at a station designated for collection and processing of envelopes and packages for overnight delivery by and overnight delivery services company as part of the ordinary business practices of Gordon Rees Scully Mansukhani, LLP, described below, addressed as set forth below.
 - BY U.S. MAIL:** I placed the document(s) listed above in a sealed envelope with postage thereon fully prepaid, in United States mail in the State of California addressed as set forth below.
 - BY ELECTRONIC FILING.** I hereby certify that on June 11, 2018, a copy of the foregoing documents were filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. All other parties will be served by regular U.S. Mail. Parties may access this filing through the Court's electronic filing system.

Attorneys for Plaintiff:

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I am readily familiar with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after the date of deposit for mailing in affidavit.

1 I declare under penalty of perjury under the laws of the United States of America that I am
2 employed in the office of a member of the Bar of this Court at whose direction the service was
3 made.

4 Executed on June 11, 2018, at San Francisco, California.

5 By: /s/ Mary Grogan
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